

FILED

OCT 08 2020

Clerk, U. S. District Court
Eastern District of Tennessee
At Knoxville

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

UNITED STATES OF AMERICA

v.

DOMINIC BROWN

Case No. 3:20-CR-55

JUDGES CRENSHAW/POPLIN

SUPERSEDING INDICTMENT

The Grand Jury charges that, between on or about May 30, 2020 and May 31, 2020, in Knox County, in the Eastern District of Tennessee, the defendant, DOMINIC BROWN, did use a facility of interstate or foreign commerce with intent (1) to incite a riot; (2) to organize, participate in, and carry on a riot; (3) to commit an act of violence in furtherance of a riot; and (4) to aid and abet any person in inciting and participating in or carrying on a riot and committing any act of violence in furtherance of a riot; and during the course of such use or thereafter performed or attempted to perform any other overt act, including but not limited to:

a. Between on or about May 30, 2020 and May 31, 2020, DOMINIC BROWN traveled to the Market Square area of downtown Knoxville, Tennessee, with intent (1) to incite a riot; (2) to organize, participate in, and carry on a riot; (3) to commit an act of violence in furtherance of a riot; and (4) to aid and abet any person in inciting and participating in or carrying on a riot and committing any act of violence in furtherance of a riot;

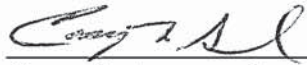
All in violation of Title 18, United States Code, Section 2101(a).

A TRUE BILL

SIGNATURE REDACTED

GRAND JURY FOREPERSON

J. DOUGLAS OVERBEY
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read "Casey T. Arrowood", is written over a horizontal line.

Casey T. Arrowood
Assistant United States Attorney